CALFED Bay-Delta ERPP/HCP Comments
SUMMARY

Volume I

Statements of purported fact are made in this document but no citations are provided to substantiate these statements. This is the case for most of the Species Visions. This is especially a problem for those Species Visions which are quite specific. For example, for Suisun Song Sparrow, it is stated that the Suisun Song Sparrow is found in 13 isolated populations, with a total population of fewer than 6,000 pairs. No citations, whether published or unpublished reports, are provided. If unpublished reports are being relied upon, these should be cited, together with information so that readers may obtain copies of the report.

The visions for the Neotropical Migratory Bird Guild, the Yellow Billed Cuckoo, and the Swainson's Hawk should all be implemented "consistent with the goals of the Riparian Habitat Joint Venture's *Riparian Bird Conservation Plan.*"

To avoid significant and potentially irrevocable impacts to Bank Swallows, we recommend that pulse flows or flushing flows for fish and/or ecosystem process restoration be prohibited (or at least severely curtailed and closely monitored) during the months of April through June, the swallow's breeding season.

Patch size issues are important for the Yellow-Billed Cuckoo. The width of riparian habitat must be at least 100 meters to benefit the Cuckoo. Sites greater than 200 acres in extent and wider than 600 meters, with greater than 65% canopy closure are optimal. Highest priority sites for restoration are those capable of producing large sites with high canopy cover and foliage volume, and moderately large and tall trees.

We recommend that the vision for the Neotropical Migratory Bird Guild be "to maintain and increase healthy populations of neotropical migratory birds by restoring the habitats on which they depend *at levels that can support nonconsumptive use and ecosystem function, consistent with the goals and objectives of the Riparian Habitat Joint Venture's Riparian Bird Conservation Plan.*" The time period during which this guild of birds depends upon the flora of California to migrate, forage and reproduce should be expanded from May-September to *March-October.* Add "increase productivity of neotropical migrants" and "improve management of riparian understory to ensure adequate vegetative cover to support nesting" as implementation actions.

Volume II

A section on benefits to the neotropical migratory bird guild has been omitted and should be added to the "Vision for Species" section in each of the following Bay-Delta Program Ecological Zones: the Sacramento River, North Sacramento Valley, and the Eastside Delta Tributaries Ecological Zones. The Point Reyes Bird Observatory possesses ample data demonstrating the prime importance of riparian habitats in these ecological zones to neotropical migratory and resident birds, and these zones are a prominent focus of the RHJV *Riparian Bird Conservation Plan.*

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The "Integration with Other Restoration Programs" sections for the Sacramento-San Joaquin Delta, San Joaquin River, East San Joaquin Basin and the West San Joaquin Basin (which already include neotropical migrants as target species), as well as the Sacramento River, North Sacramento Valley, and Eastside Delta Tributaries Ecological Zones, should cite coordination with the Riparian Habitat Joint Venture. The Riparian Habitat Joint Venture appears to have been almost entirely omitted from volume II of the draft Ecosystem Restoration Program Plan.

A section on benefits to the Shorebird and Wading Bird Guild has been omitted and should be added to the "Vision for Species" section in each of the following Bay-Delta Program Ecological Zones: The Colusa Basin, Butte Basin, Sacramento River, Feather River Basin, American River Basin, Eastside Tributaries, and West San Joaquin Basin. Shorebirds depend to a large extent on the same wetlands that are of importance to waterfowl in the Central Valley.

Developing a Strategic Plan for Ecosystem Restoration

We support the concept of using reproduction in neotropical migratory birds (and native resident birds) as an attribute to be included in a conceptual model of riparian forest habitat (p. 9). We are ready to provide input to the development of such a model. PRBO biologists could participate as technical experts in developing specific components of the conceptual models and indicators of ecological integrity for the Bay-Delta-River system. There are many reasons to include bird monitoring in the Comprehensive Monitoring, Assessment, and Research Program of Adaptive Management.

The Point Reyes Bird Observatory has an extensive bird monitoring database including GIS vegetation layers and standardized bird data from over 250 sites in riparian habitats throughout California, much of it in the Central Valley. We are in the process of developing a predictive model that will (1) clarify uncertainties as to causes in species declines/increases or reproductive failure/success, generating hypotheses that can be tested, (2) allow predictions of bird species diversity and abundance based on key habitat characteristics, and (3) inform recommendations for habitat protection, restoration and management.

California and Federal Endangered Species Act Compliance

The PRBO database described above contains data that will be essential for numerous bird species that are likely to be addressed by the HCP (such as California Yellow Warbler, Suisun Song Sparrow, Yellow-Billed Cuckoo, etc.).

CALFED Water Quality Program

In developing the comprehensive monitoring and research programs to achieve reduction of toxics in the Bay and Delta, consideration should be given to including use of seabirds as indicators of toxic contaminants. Brandt's Cormorants, Double-Crested Cormorants, and Black-crowned Night Herons in particular are valuable for this purpose. Seabirds make sensitive indicators of the presence of toxics since they are at higher trophic levels in the food chain. It is often easier and cheaper to obtain egg samples from birds than samples of designated fish species (the cost of testing for presence of contaminants remains the same). Monitoring of birds can also provide greater spatial and temporal resolution of the occurrence of contaminants due to their restriction to specific territories for feeding and nesting purposes.

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